

## UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

United States of America )

v. )

Bret Walker Shipman )

Case No. MJ-24- 120 -STE )

)

)

)

)

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 7, 2024 in the county of Oklahoma in the  
Western District of Oklahoma, the defendant(s) violated:

*Code Section*

18 U.S.C. § 1361

*Offense Description*

Destroying Federal Property with Damages Exceeding \$1,000

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Charles Stanley, Federal Bureau of Investigation (FBI)

☒ Continued on the attached sheet.

*Complainant's signature*

Charles Stanley, Special Agent, FBI

*Printed name and title*

Sworn to before me and signed in my presence.

Date: **Feb 8, 2024**City and state: Oklahoma City, Oklahoma

*Judge's signature*

Shon T. Erwin, U.S. Magistrate Judge

*Printed name and title*



there is sufficient probable cause for the requested criminal complaint and does not set forth all of my knowledge about this matter.

**PROBABLE CAUSE**

3. On February 7, 2024, at approximately 4:15 p.m., **SHIPMAN** entered the visitor's parking lot of the building occupied by the FBI, Oklahoma City Division, located at 3301 W. Memorial Road, Oklahoma City, Oklahoma. This damage building is government property. **SHIPMAN** was driving a white, four-door vehicle. After exiting his vehicle, **SHIPMAN** proceeded to climb over the security fence surrounding the perimeter of the building. After breaching the security perimeter, **SHIPMAN** proceeded toward the front entrance where he used a hammer to strike the glass windows and the glass on the doors of the FBI building. **SHIPMAN** proceeded south along the building and began striking windows along the East-facing wall.

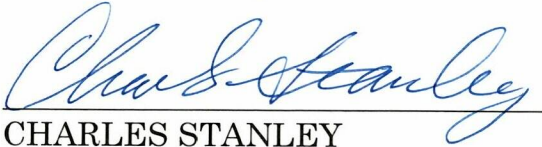
4. After striking windows along the East-facing wall, **SHIPMAN** proceeded West and began striking the South-facing windows. **SHIPMAN** was located near the Southwest corner of the building when FBI Task Force Officers and Special Agents engaged **SHIPMAN**. **SHIPMAN** was given verbal commands to put down the hammer and get on the ground. **SHIPMAN** ignored the commands, continued hitting the windows and advanced toward FBI Task Force Officers and Special Agents. **SHIPMAN** was again given

verbal commands to put the hammer down and get on the ground. **SHIPMAN** eventually complied and was taken into custody.

5. All told, over thirty (30) windows were damaged and/or broken during this incident. According to FBI Facilities, the damage to the building—and thus to government property—is well in excess of \$1,000.

**CONCLUSION**

6. Based on the foregoing, I believe that probable cause exists to show that **Bret Walker Shipman** willfully damaged government property with damages exceeding \$1,000, in violation of 18 U.S.C. § 1361.

  
CHARLES STANLEY  
Special Agent  
Federal Bureau of Investigation

SWORN AND SUBSCRIBED to before me on this 8<sup>th</sup> day of February, 2024.

  
SHON T. ERWIN  
United States Magistrate Judge